

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re GENERAL MOTORS LLC IGNITION	:	Civil Action No. 1:14-md-02543-JMF
SWITCH LITIGATION	:	
	:	APPLICATION OF DAVID W. MITCHELL
	:	AND ROBBINS GELLER RUDMAN &
This Document Relates To:	:	DOWD LLP FOR APPOINTMENT TO
	:	PLAINTIFFS' EXECUTIVE COMMITTEE
ALL ACTIONS.	:	
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I. INTRODUCTION

Pursuant to the Court's July 18, 2014 Order, David W. Mitchell and Robbins Geller Rudman & Dowd LLP submit the following Application for Appointment to the Executive Committee.

Robbins Geller is the largest, most experienced, and most successful plaintiffs' class action firm in the country. We have obtained the *largest ever recoveries* on behalf of class members in numerous different areas of complex class action litigation. *See, e.g., In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, No. 1:05-md-01720 (E.D.N.Y.) (one of three co-lead counsel, over \$5.5 billion recovery, pending); *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893 (N.D. Ill.) (acting as sole lead counsel, obtained a jury verdict and \$2.45 billion judgment for a class of investors – the largest judgment following a securities fraud class action trial in history); *In re Enron Corp. Securities Litig.*, No. H-01-3624 (S.D. Texas) (recovered over \$7 billion for a class of injured shareholders – by far the largest recovery ever obtained in any shareholder action in history); *In re UnitedHealth Group Inc. PSLRA Litig.*, No. 06-cv-016910-JMR-FLN (D. Minn.) (recovering \$925.5 million on behalf of class of investors in options backdating action; an amount five times larger than the next largest options backdating recovery).

In Pre-Trial Order No. 5, the Court set forth the following appointment criteria, among others: (1) knowledge and experience in prosecuting complex litigation, including MDLs and class actions; (2) willingness and ability to commit to a time-consuming process; (3) willingness and ability to work cooperatively with others; (4) access to resources to prosecute the litigation in a timely manner; (5) the work counsel has done in identifying, investigating, or prosecuting potential claims in the action; (6) counsel's knowledge of applicable law; and (7) geographic diversity." Dkt. 70, at 5. We address each below.

1. Robbins Geller Attorneys Are Experts in Prosecuting MDLs, Complex Class Action and Consumer Litigation and Are Well-Versed in the Applicable Law

Robbins Geller lawyers possess extensive experience prosecuting complex class actions, having successfully prosecuted, in litigation and through trial, numerous class actions. Numerous attorneys at the Firm, including Robbins Geller's lead trial counsel here, Patrick J. Coughlin and David W. Mitchell, are former Assistant United States Attorneys with extensive complex civil and criminal trial experience. Mr. Coughlin and Mr. Mitchell recently served as lead counsel in *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, No. 1:05-md-01720 (E.D.N.Y.) (over \$5.5 billion recovery, pending), and *Dahl v. Bain Capital Partners LLC*, No. 1:07-cv-12388 (D. Mass.) (proposed settlements with three of the seven defendants for over \$150 million). Mr. Coughlin also tried a large private RICO case against the major tobacco companies on behalf of hundreds of thousands of Ohio Taft-Hartley health and welfare fund participants, and helped end the Joe Camel ad campaign, a cartoon ad campaign that targeted children and secured a \$12.5 billion recovery for the cities and counties of California in the landmark 1998 state settlement with the tobacco companies. Additionally, Messrs. Mitchell and Coughlin, on behalf of the Firm, have just recently been appointed by this Court as co-lead counsel in *City of Providence, Rhode Island v. BATS Global Markets Inc.*, No. 14-cv-2811 (S.D.N.Y.), a securities class action alleging market manipulation in the multibillion dollar market relating to high frequency trading practices.

In addition, to Mr. Coughlin and Mr. Mitchell, Mark J. Dearman has particular experience in the automotive arena. Prior to joining Robbins Geller in 2010, Mr. Dearman initially focused his practice on the defense of product liability and consumer fraud claims pertaining to the manufacture and distribution of automobiles. Of particular significance, Mr. Dearman served as national coordinating counsel for AutoNation in its product liability actions, including the Ford-Firestone

litigation. Likewise, Mr. Dearman defended similar claims for ANC Rental Corp. and was intimately involved in the handling of ANC Rental's claims, before and after their Chapter 11 bankruptcy filing. After spending 10 plus years as a defense lawyer, Mr. Dearman now focuses on prosecuting consumer claims and product liability claims. At Robbins Geller, Mr. Dearman has served as lead counsel and co-lead counsel in several consumer cases, and has spearheaded the firms' efforts in *In re: Ford Fusion & C-Max Fuel Economy Litig.*, No. 13-MD-2450 (S.D.N.Y.).

The firm has experienced success prosecuting consumer class actions, with Robbins Geller attorneys serving recently as lead counsel in *In re Groupon Marketing and Sales Practices Litig.*, Case No. 3:11-md-02238-DMS-RBB (S.D. Cal.), and as co-lead counsel in *In re Mattel, Inc. Toy Lead Paint Products Liability Litig.*, No. 2:07-ml-01897-DSF-AJW (C.D. Cal.) (settlement for up to \$50 million in full cash refunds and lead testing reimbursements), and *Gemelas v. Dannon Co., Inc.*, No. 1:08-cv-00236 (N.D. Ohio) (\$45 million settlement). The firm has successfully litigated numerous additional consumers cases, recovering hundreds of millions of dollars on behalf of plaintiffs and class members. *E.g.*, *Kehoe v. Fid. Fed. Bank & Trust*, No. 03-80593-CIV-HURLEY (S.D. Fla.) (\$50 million settlement on behalf of drivers in consumer privacy case); *In re Trans Union Corp. Privacy Litig.*, No. 00- CV-4729, MDL No. 1350 (E.D. Ill.) (\$75 million settlement fund obtained against one of the nation's largest credit reporting agencies); *In re Prudential Ins. Co. of Am. Sales Practices Litig.*, MDL No. 1061 (D.N.J.) (\$4 billion settlement in deceptive sales practice action regarding "vanishing premium" sales scheme).

Robbins Geller will provide the Class with unsurpassed experience and expertise in the applicable law in prosecuting this complex consumer class action for the benefit of the Class.

2. Robbins Geller Is Willing to Submit to a Time-Consuming Process and Is Willing to Work Cooperatively with Others

Complex actions such as this commonly span several years. Robbins Geller is accustomed to committing the time and resources to long-running and time-consuming cases. *See, e.g., In re Payment Card Interchange* (filed in 2005 with settlement approved by the District Court in late 2013) and *Dahl v. Bain Capital* (filed in 2007 with some settlements during 2014). Additionally, nearly all of our other complex class action cases span three or more years. And in many of these cases, we have effectively and cooperatively teamed with other counsel to prosecute the classes' claims,¹ and intend to do so in the case.

3. Robbins Geller Has Unmatched Resources to Prosecute This Action in A Timely Manner

Robbins Geller has the most extensive resources of any plaintiffs' law firm in the country. Supporting the attorneys are scores of experienced paralegals, in-house forensic accountants, investigators and litigation support specialists with access to cutting-edge information technology resources. Robbins Geller's technological capabilities boast an unparalleled high-speed disk system capable of securely hosting more than 150 terabytes of data. The secure system is highly scalable and can host, onsite, a nearly limitless amount of data. The firm also uses the most advanced document review platforms. Combined with Robbins Geller's disk storage capabilities, the firm is able to host extremely large document productions and **dramatically reduce** the cost paid to outside vendors, especially when many millions of documents will be produced. With such extensive resources at our disposal, the Firm can most effectively and efficiently prosecute this case.

¹ Robbins Geller has teamed as co-lead counsel with two other firms in the *City of Providence, Rhode Island* matter.

4. Robbins Geller Performed Substantial Investigative Work

Robbins Geller has already performed substantial work investigating and identifying common law and state and federal statutory claims on behalf of Plaintiff and the proposed Class, including retaining experienced bankruptcy counsel. We have retained an industry expert who assisted with the evaluation of the design, manufacture, and assembly of the ignition switch and its related component parts, including: (1) a history and timeline of the ignition switch; (2) an initial evaluation of the specifications of the ignition switch; and (3) an analytical prediction of conditions that resulted in ignition switch turn-off. Robbins Geller has also examined the extent of Defendants' knowledge of such defects and the consumer complaints regarding the defects, and will continue to identify and investigate the facts and circumstances surrounding the defectively designed ignition switches.

5. Robbins Geller Is Geographically Diverse

The firm's offices are located in San Diego, San Francisco, Manhattan, Melville, New York, Chicago, Nashville, Boca Raton, Florida, Washington D.C., Philadelphia and Atlanta. We are as diverse as any Firm.

II. CONCLUSION

For the above reasons, we respectfully request that this Court appoint David W. Mitchell of Robbins Geller to Plaintiffs' Executive Committee. On behalf of Plaintiff and Robbins Geller, Mr. Mitchell intends to address the Court at the August 11, 2014 Initial Conference.

DATED: July 28, 2014

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CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 28, 2014.

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